

**CALIFORNIA CIVIL RIGHTS LAW GROUP**

Lawrence A. Organ (SBN 175503)  
Navruz Avloni (SBN 279556)  
332 San Anselmo Avenue  
San Anselmo, California 94960-2664  
Telephone: (415) 453-4740  
Facsimile: (415) 785-7352  
larry@civilrightsca.com  
navruz@civilrightsca.com

Attorneys for Plaintiffs,  
DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and  
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;  
CITISTAFF SOLUTIONS, INC.; WEST  
VALLEY STAFFING GROUP;  
CHARTWELL STAFFING SERVICES, INC.;  
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**DECLARATION OF LAWRENCE  
ORGAN IN SUPPORT OF PLAINTIFFS'  
OPPOSITION TO DEFENDANT TESLA,  
INC.'S MOTION FOR PARTIAL  
SUMMARY JUDGEMENT**

Date: October 23, 2019

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

Complaint filed: October 16, 201

1 I, LAWRENCE ORGAN, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an  
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for  
4 Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this Declaration in support of  
5 Plaintiffs' Opposition to Defendant's Motion for Summary Judgment. I have personal  
6 knowledge of the facts stated herein and if called upon to testify, I could and would competently  
7 testify thereto, except as to those matters that are stated upon information and belief.  
8

9 2. Attached hereto and marked as Exhibit 1 is a true and correct copy of a document  
10 produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped  
11 CITISTAFF0000034-CITISTAFF0000035.  
12

13 3. Attached hereto and marked as Exhibit 2 is a true and correct copy of various  
14 excerpts from the deposition of Edward Romero.

15 4. Attached hereto and marked as Exhibit 3 is a true and correct copy of various  
16 excerpts from the deposition of Tamotsu Kawasaki.  
17

18 5. Attached hereto and marked as Exhibit 4 is a true and correct copy of various  
19 excerpts from the deposition of Victor Quintero.

20 6. Attached hereto and marked as Exhibit 5 is a true and correct copy of various  
21 excerpts from the deposition of Wayne Jackson.  
22

23 7. Attached hereto and marked as Exhibit 6 is a true and correct copy of a document  
24 produced by Plaintiff Demetric Di-az in discovery and Bates-stamped DDIAZ000004-  
25 DDIAZ000007.

26 8. Attached hereto and marked as Exhibit 7 is a true and correct copy of various  
27 excerpts from the deposition of Monica De Leon.  
28

1           9.       Attached hereto and marked as Exhibit 8 is a true and correct copy of various  
2 excerpts from the deposition of Annalisa Heisen.

3           10.      Attached hereto and marked as Exhibit 9 is a true and correct copy of various  
4 excerpts from the deposition of Erin Marconi.

5           11.      Attached hereto and marked as Exhibit 10 is a true and correct copy of various  
6 excerpts from the deposition of Veronica Martinez.

7           12.      Attached hereto and marked as Exhibit 11 is a true and correct copy of Defendant  
8 Tesla, Inc.'s Responses to Plaintiff Owen Diaz's Requests for Production of Documents, Set  
9 Five.  
10

11           13.      Attached hereto and marked as Exhibit 12 is a true and correct copy of Defendant  
12 nextSource, Inc.'s Responses to Plaintiff Owen Diaz's Requests for Production of Documents,  
13 Set One.  
14

15           14.      Attached hereto and marked as Exhibit 13 is a true and correct copy of various  
16 excerpts from the deposition of Michael Wheeler.

17           15.      Attached hereto and marked as Exhibit 14 is a true and correct copy of Defendant  
18 Tesla, Inc. dba Tesla Motors, Inc.'s Responses to Plaintiff Owen Diaz's Interrogatories, Set  
19 Three.  
20

21           16.      Attached hereto and marked as Exhibit 15 is a true and correct copy of various  
22 excerpts from the deposition of Titus McCaleb.

23           17.      Attached hereto and marked as Exhibit 16 is a true and correct copy of various  
24 excerpts from the deposition of Andres Donet.

25           18.      Attached hereto and marked as Exhibit 17 is a true and correct copy of a  
26 document produced by Defendant West Valley Staffing Group in discovery and Bates-stamped  
27 WV000051-WV000063.  
28

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct. Executed on November 19, 2019 in San Anselmo, California.  
3

4  
5 DATED: November 19, 2019

By: /s Lawrence Organ  
Lawrence A. Organ, Esq.  
Navruz Avloni, Esq.  
J. Bernard Alexander, Esq.  
Attorneys for Plaintiffs  
DEMETRIC DI-AZ AND OWEN DIAZ  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28